



Since 1898

E. Stewart Jones, Jr.
W. Farley Jones
George E. LaMarche III

Meghan Rielly Keenholts
Sarah Spain Holt

28 Second Street
Troy, New York 12180
Telephone (518) 274-5820
Toll Free (866) ESJONES
(866) 375-6637
Fax (518) 274-5875
E-mail: info@esjlaw.com

January 20, 2011

Hon. David N. Hurd
300 Alexander Pirnie Federal Bldg.
10 Broad Street
Utica, New York 13501

Re: USA v. Kamla Sahabir
1:09-cr-00507-DNH
Our File No. CR-865

Dear Judge Hurd:

I have reviewed the Order to Show Cause submitted by Andrew Safranko on behalf of Baldeo Sahabir and hereby join in the application and request that the Court grant a new trial based on the newly discovered evidence and in the interests of justice, or in the alternative, grant a hearing to address this issue.

Finally, we also join in the request that the Court grant defendants' request for a stay of detention pending the resolution of this matter.

Sincerely,

E. STEWART JONES, PLLC

/s/ E. Stewart Jones, Jr.

E. Stewart Jones, Jr.

ESJ,JR./ml